

EXHIBIT 1

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

In re: Shimano Crankset Litigation

Case No.: 8:23-cv-02038-JVS(JDEx)

**DECLARATION OF RODERICK
RUSSELL**

DECLARATION OF RODERICK RUSSELL

1 **DECLARATION OF RODERICK RUSSELL**

2 I, Roderick Russell, hereby declare as follows:

3 1. I am the owner of BG Bicycles-Pro Bicycle Shop (“BG Bike Shop”) in
4 Houma, Louisiana. BG Bike Shop sells hundreds of bicycles per year. I have owned
5 BG Bike Shop for over ten years.

6 2. BG Bike Shop is an authorized Shimano dealer and sells bicycles
7 equipped with Shimano components, including Shimano cranksets.

8 3. In addition to owning BG Bike Shop, I am also a licensed professional
9 mechanic. I am certified as a Shimano Platinum STEC Technician, which, to my
10 knowledge, is the highest level of mechanic certification offered by Shimano.

11 4. I service and repair hundreds of bicycles per year for BG Bike Shop
12 customers.

13 5. In fall 2023, Shimano announced a major recall of its Ultegra and Dura-
14 Ace cranksets because the bonded crank parts on the cranksets could separate,
15 delaminate and/or break. In this declaration I refer to the cranksets affected by
16 Shimano’s 2023 recall as the “Shimano Cranksets.” The separation issue is a serious
17 safety hazard because if a crankset separates or breaks while a cyclist is riding the
18 bicycle it can cause a crash. In other words, a bicycle’s crankset is a critical
19 component, and it is necessary for the crankset to be in good working order for the
20 safety of the rider.

21 6. Prior to Shimano’s announcement of the recall, I was not aware of the
22 bonding separation and delamination issue because the Shimano Cranksets did not
23 appear defective to the naked eye.

24 7. As part of the recall, Shimano advised cyclists to have their Shimano
25 Cranksets inspected at an authorized Shimano dealer, and Shimano sent training
26 materials to the dealers describing how to perform the inspections. BG Bike Shop is
27

1 authorized to perform the recall inspections, and I received and reviewed the training
2 materials distributed by Shimano in connection with the crankset recall.

3 8. The training materials instruct mechanics to visually inspect the
4 cranksets for signs of bonding separation or delamination. Shimano did not provide
5 dealers any equipment to scan or image the Shimano Cranksets to identify signs of
6 bonding separation or delamination, which is necessary to thoroughly examine the
7 cranksets for signs of bonding separation or delamination.

8 9. A visual inspection is insufficient to identify the safety issue with the
9 Shimano Cranksets. The cranksets can separate and break at any time, including in
10 the days, weeks, or months after they “pass” the visual inspection performed in
11 connection with the crankset recall. I am aware of a report from another bicycle
12 mechanic that a Shimano Crankset failed shortly after it “passed” a visual inspection.
13 Early signs of separation or delamination may not be visible to the naked eye, and,
14 given the nature of the defect, even those Shimano Cranksets that have not yet started
15 to visibly fail may fail at any time in the future.

16 10. Some bicycle mechanics follow Shimano’s instructions and send cyclists
17 back out onto the road if their Shimano Crankset “passes” the visual inspection. I have
18 personally inspected approximately a dozen Shimano Cranksets in connection with
19 Shimano’s recall. Because it is not safe to send cyclists back out onto the road with
20 these cranksets, I have “failed” every Shimano Crankset I have inspected. That is
21 because there is no way to “pass” the safety inspection through visible examination
22 alone, and I will not send cyclists back out onto the road with a crankset that may
23 spontaneously fail in the future because of the safety risk associated with a crankset
24 failure.

25 11. The bonding and separation issue with the Shimano Cranksets is not
26 merely a durability issue. It is true that many bicycle components will degrade over
27
28

1 time, but cranksets are not supposed to spontaneously delaminate and break during
2 their useful life, as the Shimano Cranksets are prone to do.

3 12. I had new Shimano Cranksets for sale in BG Bike Shop. Because of the
4 safety defect, I pulled the Shimano Cranksets from my store's shelves and returned
5 them to Shimano after Shimano provided me a return merchandise authorization and
6 return label. The Shimano Cranksets are not saleable because they can delaminate and
7 break without warning while in operation.


8 13. Shimano represents that their cranksets are durable, reliable, and provide
9 pedaling stability. In the cycling community, these terms are understood as
10 representations about the cranksets' performance and safety. A crankset can only be
11 durable, reliable, and stable if it does not have a tendency to suddenly break, including
12 without warning, during its useful life. And a crankset that suddenly breaks during its
13 useful life is not safe because it can cause a crash.

14
15 I declare under penalty of perjury that the foregoing is true and correct.

16
17 Dated: 4/20/2024

By: _____

DocuSigned by:


20A07D6F43E04FF